

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JUMP OPERATIONS, LLC,

Plaintiff,

v.

LIAM HEEGER,

Defendant.

Case No. 1:25-cv-00703

NOTICE OF MOTION TO DISMISS
PLAINTIFF'S COMPLAINT FOR INJUNCTIVE RELIEF

Defendant Liam Heeger respectfully moves the Court to dismiss Plaintiff Jump Operations, LLC's Complaint for Injunctive Relief pursuant to Federal Rule of Civil Procedure 12(b)(6). Defendant has set forth the bases for dismissal in an accompanying Memorandum of Law.

WHEREFORE, Defendant respectfully requests the Court enter an Order dismissing Plaintiff's Complaint for Injunctive Relief with prejudice, and for any other further relief the Court deems appropriate.

[signature page follows]

Dated: February 7, 2025

Respectfully submitted,

COOLEY LLP

/s/ Miriam Petrillo

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CERTIFICATE OF SERVICE

I, Miriam Petrillo, an attorney, hereby certify that on February 7, 2025, I caused a true and correct copy of the foregoing document to be electronically filed with the Clerk of Court via the CM/ECF system, which will send notifications of such filing to all counsel of record.

/s/ Miriam Petrillo

Miriam Petrillo